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August 20, 2019

Hon. Gregory H. Woods
Via Pacer
500 Pearl St.
NY NY 10007

Re: American E Group v
Livewire Ergogenics
v Elana Hirsch et al
Index 1-18-cv-3969-
GHW – Withdrawal
of counsel

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Dear Judge Woods

Third party Defendants counsel, Bryce Jones, Esq., attorney for Sunny
Joseph Barkats and JSBarkats, PLLC has terminated Joseph Paukman as attorney (see Docket
165). It is unclear if Sunny Joseph Barkats and JSBarkats, PLLC has terminated me, but if he did
it was based on the advice of other counsel in this case.

Local Civil Rule 1.4. Withdrawal or Displacement of Attorney of Record

An attorney who has appeared as attorney of record for a party may be relieved or displaced only
by order of the Court and may not withdraw from a case without leave of the Court granted by
order. Such an order may be granted only upon a showing by affidavit or otherwise of
satisfactory reasons for withdrawal or displacement and the posture of the case, including its
position, if any, on the calendar, and whether or not the attorney is asserting a retaining or

charging lien. All applications to withdraw must be served upon the client and (unless excused by the Court) upon all other parties.

If the Court wishes, the reasons for withdrawal can be stated in camera and under seal. I am asserting a charging lien (40 percent to be split by Bryce Jones, Jerome Noll, myself and any other lawyers, on any judgments won by Sunny Joseph Barkats and JSBarkats, PLLC., but not less than 10 percent and \$700).

This motion is in furtherance of my obligation to seek withdrawal from this case based on the termination in Docket 65.

/s/Joseph Paukman

JOSEPH PAUKMAN

cc Sunny Joseph Barkats and JSBarkats, PLLC via email to sunnybkats@gmail.com